

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	Bankruptcy No.: 16-23808-CMB
IFTIKHAR A. MALIK and NASREEN)	
MALIK,)	Chapter 13
)	
Debtors.)	Related to Document No. 159
)	
)	Hearing Date and Time:
ERIC E. BONONI, Trustee,)	Tuesday August 22, 2017 at 1:30 P.M.
)	
Movant,)	
)	
v.)	
)	
IFTIKHAR A. MALIK and NASREEN)	
MALIK, and BAHRAM PANAHIAZAR)	
)	
Respondents.)	

**LIMITED RESPONSE OF THE COUNTY OF ALLEGHENY, CITY AND SCHOOL
DISTRICT OF PITTSBURGH, WOODLAND HILLS SCHOOL DISTRICT,
AND PITTSBURGH WATER AND SEWER AUTHORITY TO MOTION TO SELL
PROPERTY FREE AND DIVESTED OF LIENS, AND ENCUMBRANCES**

AND NOW, come the County of Allegheny, City and School District of Pittsburgh, Woodland Hills School District, and the Pittsburgh Water and Sewer Authority, by and through its Counsel, Goehring, Rutter & Boehm, Jeffrey R. Hunt, Esquire, and Christina L. Preville, Esquire and respectfully file this Limited Response:

1. On October 10, 2016, Iftikhar A. Malik and Nasreen Malik ("Debtors") filed the within Chapter 13 bankruptcy case. This case was converted to Chapter 7 on November 15, 2016.

2. The Debtors own a one-half interest in the following parcels of real property situate within the County of Allegheny, Pennsylvania (collectively, the "Properties"):

- A. 318 Jucunda Street, Pittsburgh, PA 15210 (Block and Lot 14-K-201)
- B. 209 Jucunda Street, Pittsburgh, PA 15210 (Block and Lot 14-K-148)
- C. 38 Prospect Avenue Turtle Creek, PA 15145 (Block and Lot 375-D-110)

D. 7522 Elk Road Pittsburgh, PA 15235 (Block and Lot 173-M-30)

E. 27 Oakmont Avenue Duquesne, PA 15110 (Block and Lot 304-G-44)

F. 817 Catherine Street Duquesne, PA 15110 (Block and Lot 378-N-131) being designated as Block and Lot 1130-S-40 in the Department of Real Estate of

3. On or about July 20, 2017, the Trustee filed a motion to sell the Properties free and clear of all liens, claims and encumbrances. According to the motion, the Properties are being sold to Bahram Panahiazar, who owns the other one-half interest in the Properties.

4. Pursuant to Paragraph 22 of the motion, the buyer of the Properties shall assume the real estate taxes owed for the Properties.

5. The County of Allegheny ("County"), City and School District of Pittsburgh ("City"), Woodland Hills School District ("WHSD"), and Pittsburgh Water & Sewer Authority ("PWSA") are secured creditors in the within bankruptcy case by virtue of delinquent real estate taxes owed by Debtors for the Properties.

6. On March 21, 2017, the County filed Proof of Claim No. 15-1 for pre-petition delinquent real estate taxes owed by Debtors for various parcels of real estate including the Properties (a total of \$6,110.41 pertains to the Properties plus statutory interest).

7. On March 21, 2017, the City filed Proof of Claim No. 14-1 for pre-petition delinquent real estate taxes owed by Debtors for various parcels of real estate including the Properties (a total of \$9,552.07 pertains to the Properties plus statutory interest).

8. On March 21, 2017, the WHSD filed Proof of Claim No. 17-1 for pre-petition delinquent real estate taxes owed by Debtors for various parcels of real estate including the Properties (a total of \$1,860.17 pertains to the Properties plus statutory interest).

9. On March 21, 2017, the PWSA filed Proof of Claim No. 16-1 for pre-petition delinquent real estate taxes owed by Debtors for various parcels of real estate including the Properties (a total of \$558.72 pertains to the Properties plus statutory interest).

10. The County, City, WHSD, and PWSA have no objection to the sale provided that they are paid in full for all current and delinquent real estate taxes owed on the Properties from the proceeds of the sale, or in the alternative, as long as it is recognized that the above-referenced unpaid real estate taxes shall remain secured liens against the Properties and in such case the taxes shall remain open and shall be paid by the buyer.

11. To the extent that the County, City, WHSD and/or PWSA are not paid in full at the time of closing, this sale shall not divest any said liens of the County WHSD, City or PWSA.

WHEREFORE, the County of Allegheny, City and School District of Pittsburgh, Woodland Hills School District, and Pittsburgh Water and Sewer Authority pray that this Honorable Court direct that their delinquent real estate taxes be paid in full at the time of closing or, in the alternative, that the sale shall not divest their liens and shall remain secured against the Properties until paid in full.

Dated: August 3, 2017

Respectfully submitted,

GOEHRING, RUTTER & BOEHM

By: /s/ Christina L. Preville
Jeffrey R. Hunt, Esquire
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Christina L. Preville, Esquire
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	Bankruptcy No.: 16-23808-CMB
IFTIKHAR A. MALIK and NASREEN)	
MALIK,)	Chapter 13
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Debtors.)	Related to Document No. 59
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ERIC E. BONONI, Trustee,)	Tuesday August 22, 2017 at 1:30 P.M.
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Movant,)	
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v.)	
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IFTIKHAR A. MALIK and NASREEN)	
MALIK, and BAHRAM PANAHIAZAR)	
)	
Respondents.)	

CERTIFICATE OF SERVICE

I, Christina L. Preville, do hereby certify that a true and correct copy of the foregoing LIMITED RESPONSE OF COUNTY OF ALLEGHENY, CITY AND SCHOOL DISTRICT OF PITTSBURGH, WOODLAND HILLS SCHOOL DISTRICT, AND PITTSBURGH WATER AND SEWER AUTHORITY TO MOTION TO SELL PROPERTY FREE AND DIVESTED OF LIENS, AND ENCUMBRANCES has been served upon each of the following listed on the 3rd day of August, 2017 by first class U.S. mail, postage prepaid at the following addresses:

Iftikhar A. Malik
132 Peppergrass Road
Baden, PA 15005

Stephen J. Jurman
1729 Yorktown Place
Pittsburgh, PA 15235

Nasreen Malik
132 Peppergrass Road
Baden, PA 15005

Bahram Panahiazar
801 Cranberry Dr.
Monroeville, PA 15146

Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

Eric E. Bononi, Esquire
20 North Pennsylvania Ave, Suite 201
Greensburg, PA 15601-2337

AND ALL PARTIES AND CREDITORS LISTED ON THE CLERK'S OFFICE MAILING MATRIX

Respectfully submitted,

GOEHRING, RUTTER & BOEHM

By: /s/ Christina L. Preville
Christina L. Preville, Esquire

Label Matrix for local noticing
0315-2
Case 16-23808-CMB
WESTERN DISTRICT OF PENNSYLVANIA
Pittsburgh
Thu Jul 20 14:11:31 EDT 2017

Ally Financial
PO Box 130424
Roseville MN 55113-0004

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PO Box 380901
Bloomington, MN 55438-0901

American Express Bank FSB
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Malvern PA 19355-0701

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P O BOX 168088
IRVING TX 75016-8088

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Phoenix, AZ 85004-1071

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Po Box 24696
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Citibank / Sears
Citicard Credit Svcs/Centralized Bankrup
Po Box 790040
Saint Louis, MO 63179-0040

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Citicorp Credit Svcs/Centralized Bankrup
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Saint Louis, MO 63179-0040

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PITTSBURGH PA 15243-1477

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Columbus, OH 43218

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Bankruptcy Division PO Box 280946
Harrisburg, PA 17128-0946

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Department 280946
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Harrisburg, PA 17128-0946

Peoples Natural Gas Company LLC
c/o S. James Wallace, P.C.
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Pittsburgh, PA 15222-3826

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LeClaire Griewahn & Scott LLC
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Pittsburgh, PA 15233-1715

Steel Valley School District
c/o Legal Tax Service
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West Mifflin, PA 15122-1030

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Orlando, FL 32896-5064

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Orlando, FL 32896-5064

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KML Law Group, P.C.
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Philadelphia, PA 19106-1541

Wells Fargo Auto Finance
Attn: Bankruptcy 2nd Floor
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Eden Prairie, MN 55344-2252

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

American Honda Finance
Po Box 168088
Irving, TX 75016

Collection Service Cen
Attn:Collection Center
Po Box 14931
Pittsburgh, PA 15234

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

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(d)City and School District of Pittsburgh
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(u)Duquesne Light Company

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(u)JPMORGAN CHASE BANK, N.A.

(u)Municipality Of Penn Hills

(u)Nissan Motor Acceptance Corporation

(d)North Allegheny School District
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Document Page 8 of 8
Mailing Matrix Page 4 of 4

End of Label Matrix

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